

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	Chapter 13
JOSEPH M. PANIGALL and	)	Case No. 18-24599-CMB
SHEILA A. PANIGALL	)	
Debtors	)	
	)	
RONDA J. WINNECOUR, CHAPTER 13 TRUSTEE	)	
Movant	)	
vs.	)	
	)	STIPULATED ORDER
SANTANDER BANK, N.A.	)	Hearing Date: Oct. 13, 2022
RESPONDENT	)	Response Deadline: Sept. 26, 2022
	)	Related Documents: 173 & 174

**STIPULATED ORDER TO EXTEND RESPONSE DATE ON TRUSTEE'S MOTION TO PRECLUDE  
NOTICES OF POST-PETITION MORTTGAGE FEES, EXPENSES AND CHARGES**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, SANTANDER BANK, N.A., ("Santander"), by and through its attorney, Kellie Rahl-Heffner, Esquire of Gross McGinley LLP, and Trustee, Ronda J. Winnecour, ("Trustee"), agree and stipulate to extend the Response Date on the Trustee's Motion to Preclude Notices of Post-Petition Mortgage Fees, Expenses and charges as follows:

1. The Parties are currently negotiating a resolution to this Motion but need additional time to finalize a Stipulation. The parties anticipate having the Stipulation resolving this matter filed prior to the hearing date of October 13, 2022.

2. The Parties agree to extend the Response Date on the within Motion to October 10, 2022. If a settlement Stipulation is not finalized on or before October 10, 2022, Santander Bank will file a response to the Motion.

/s/Kellie Rahl-Heffner, Esq.  
Kellie Rahl-Heffner, Esquire  
Attorney for Santander Bank  
Attorney ID No. 200962

/s/ James Warmbrodt, Esq.  
Ronda J. Winnecour – Chapter 13 Trustee  
By: James Warmbrodt, Esquire  
Attorney ID No. 42524

ORDERED AND APPROVED BY THE COURT:

Chief Judge: Carlota M. Bohm